

K&L GATES

May 7, 2024

By ECF

The Honorable Gregory H. Woods
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: USA v. Kostin, et al., Case No. 24-cr-00091-GHW

Dear Judge Woods:

We represent Defendant Vadim Wolfson (“Wolfson”) in the referenced action and write in response to the Court’s Order, Dkt. No. 45, setting a hearing on May 9, 2024 at 3:00 p.m. to discuss Defendant Wolfson’s Motion to Modify Filter Team Procedures and for Injunction Against Release or Review of Records Pending Ruling, Dkt. No. 39.

Counsel respectfully applies for leave for Defendant Wolfson not to appear at the conference pursuant to Fed. R. Crim. P. 43(b).

Respectfully submitted,

/s/ David Rybicki

David Rybicki